

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

CALVIN T. NAKATA, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ABBVIE INC., RICHARD A. GONZALEZ,  
ROBERT A. MICHAEL, JEFFREY R.  
STEWART, and MICHAEL E. SEVERINO,

Defendants.

Case No: 1:22-cv-01773

Judge: Harry D. Leinenweber

**DECLARATION OF CARL V. MALMSTROM IN SUPPORT OF MOTION TO APPOINT  
ALLAN WOODRUFF AS LEAD PLAINTIFF AND FOR APPROVAL OF LEAD  
PLAINTIFF'S SELECTION OF COUNSEL**

Carl V. Malmstrom, hereby declares;

1. I am an attorney with Wolf Haldenstein Adler Freeman & Herz LLC, proposed Liaison Counsel in this action. I have personal knowledge of the facts set forth herein. I make this declaration in support of the motion of Allan Woodruff ("Movant") to be appointed Lead Plaintiff for the Class and for approval of Lead Plaintiff's selection of The Rosen Law Firm, P.A. as Lead Counsel and Wolf Haldenstein Adler Freeman & Herz LLC as Liaison Counsel for the Class.

2. Attached hereto as Exhibit 1 is a true and correct copy of a PSLRA early notice.

3. Attached hereto as Exhibit 2 is a true and correct copy of Movant's PSLRA certification.

4. Attached hereto as Exhibit 3 is a true and correct copy of Movant's loss chart.

5. Attached hereto as Exhibit 4 is a copy of the firm resume of The Rosen Law Firm, P.A.

6. Attached hereto as Exhibit 5 is a copy of the firm resume of Wolf Haldenstein Adler  
Freeman & Herz LLC.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on June 6, 2022.

/s/ Carl V. Malmstrom  
Carl V. Malmstrom

**CERTIFICATE OF SERVICE**

I, Carl V. Malmstrom, one of the attorneys for movant, hereby certify that on June 6, 2022, service of the foregoing ***Declaration of Carl V. Malmstrom in Support of Motion of Allan Woodruff for Appointment as Lead Plaintiff and Approval of Lead Plaintiff's Selection of Counsel*** was accomplished pursuant to ECF as to Filing Users and I shall comply with LR 5.5 as to any party who is not a Filing User or represented by a Filing User.

/s/ Carl V. Malmstrom  
Carl V. Malmstrom